

## **REMARKS**

Entry of the amendments is respectfully requested. Favorable reconsideration and allowance of this application is respectfully requested in light of the amendments and the following remarks.

### **1. Objection to the Claims**

Claim 14 has been amended to correct a typographical error. Withdrawal of the objection to the claims is requested.

### **2. Rejections Based on Form**

Claims 31 and 32 were rejected under 35 U.S.C. §112, second paragraph. While Applicant believes the context of the claims made it clear as to what the “first plurality” and the “second plurality” referred to in lines 16-20; nevertheless, these claims have been amended to provide additional clarity. Withdrawal of the rejection is respectfully requested.

### **3. Rejections Based on the Prior Art**

#### **a. Rejections under 35 U.S.C. §102**

Claims 1-16 were rejected as being anticipated by U.S. Patent No. 6,061,067 to Silva et al. (hereinafter, “Silva”). Silva discloses a 3D modeling system for generating 3D representations of a modeled object on a display device of a computer system. More particularly, Silva describes the modeled object as being “represented by an initial definition of an object and a set of modifiers.” (1:58-59) “Each modifier modifies some portion of the definition of the object that may result in a change in appearance of the object when rendered.” (1:59-61) The modifiers are described as being included in a modifier stack that also includes, as shown in FIG. 2, a modifier stack, an object space

modifier, a transform, and a world space modifier. The functionality of these components of the modifier stack is described at column 11, lines 3-33. Moreover, Silva describes the modifier stack as being maintained by a derived object. (10:59-60) In another embodiment, rather than maintaining the modifier stack, the derived object “maintains a reference to the master object 210, a reference to transform 230, and a list of modifiers.” (10:63-64) In other words, the derived object can be considered the modification (as defined by the modifiers) of an object (master object) together with a transform that “is responsible for transforming points in the object space coordinate system to corresponding points in the world space coordinate system.” (11:12-13)

Thus, the derived object, contrary to the conclusion of the Examiner, is not a “second memory portion” as recited in claim 1. The second memory portion is claimed as “duplicatively stor[ing] a first subset of the first plurality of files (stored in a first memory portion) and a second subset of the second plurality of files (stored in the first memory portion).” (parentheses added) While the derived object described by Silva is not believed to be a “memory portion”, even assuming that it is, the derived object does not store subsets of the memory stack, which the Examiner has concluded meets the limitation of a first plurality of files, and does not store subsets of the transform and the world space modifier, which the Examiner has concluded meets the limitation of the second plurality of files. Silva discloses that the derived object evaluates the modifier stack and may include references to components of the modifier stack, but Silva does not teach that the derived object contains the aforementioned subsets.

In other words, to support the Examiner’s conclusion, Silva must disclose that the derived object, or at least the cache that stores the derived object, includes a copy of a portion of the transform and the world space modifier. Silva makes no such teaching. Specifically, Silva neither describes nor suggests (1) duplicating either the transform or the world space modifier or (2) parceling out a portion of the “files” that constitute the transform or the world space modifier and saving those parceled portions in a memory

portion that is different from where the entirety of the transform and world space modifier are saved.

Accordingly, since the reference fails to teach each and every limitation recited in the claims, the Examiner has failed to establish a prima facie case of anticipation. As such, Applicant requests allowance of claims 1-16.

b. Rejections under 35 U.S.C. §103

Claims 17-30 stand rejected as being obvious over Silva in view of U.S. Patent No. 7,064,766 to Beda et al. (hereinafter, “Beda”). The Examiner has primarily relied upon Silva but has also relied upon Beda for the disclosure of high-level and low-level information. More particularly, the Examiner has relied on Beda for teaching that one type of information may be categorized as high-level and another type of information can be categorized as low-level; otherwise, the Examiner has relied upon the disclosure of Silva.

As explained in the previous section, Silva does not describe duplicative storing of information as recited in the claims, whether that information be a first type, second type, high-level, or low-level. Silva describes a modifier stack that contains various modifiers to modify an object. That modified object may be cached, if desired. However, the modifiers themselves are not cached – only the results of applying such modifiers.

Thus, even assuming that one skilled in the art would have been motivated to combine the teachings of Silva and Beda, the combination fails to teach all the limitations of the claims. As such, a prima facie case of obviousness for claims 17-30 has not been properly established. Withdrawal of the rejection is therefore requested.

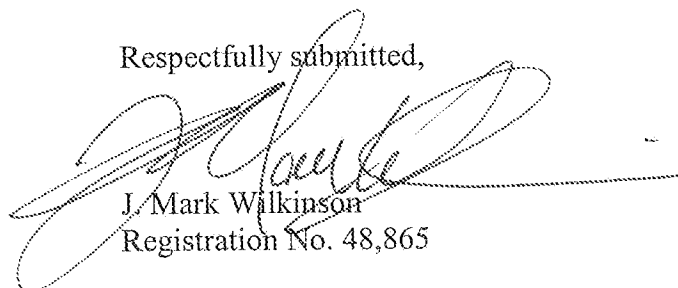
#### 4. Conclusion

It is submitted that claims 1-30 define patentable subject matter. A Notice of Allowance is therefore respectfully requested.

Should the examiner consider any other fees to be payable in conjunction with this or any future communication, the Director is authorized to direct payment of such fees, or credit any overpayment to Deposit Account No. 50-1170.

The examiner is invited to contact the undersigned by telephone if it would help expedite matters.

Respectfully submitted,



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